DRAFT

IDENTIFICATION AND REPORTING

OF ARMY MEDICAL DEPARTMENT

ENVIRONMENTAL PROGRAM SUBMISSIONS

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MEDCOM MESSAGE

The MEDCOM uses the EPS data as one of its tools for programming and justifying environmental funding requirements to higher headquarters. This information is also used to program annual funding distributions. It is critical that only bona fide environmental projects be entered into the EPS database. Estimated cost and obligation data must also be accurate.

The preferred method for meeting compliance requirements, reducing operating costs and maintaining environmental stewardship is through pollution prevention and conservation projects. All Class 0, 1, and 2- **High** projects are **Must Fund** requirements. The installation/activity is committing itself to funding these projects even if there is insufficient environmental funding. Therefore, the installation/activity commander must be aware of these requirements because they can adversely impact other local funding resources. Only those projects that can be initiated during the year that funds are requested should be given a **High** assessment or programmed for funding during that year. All Class 0, Class 1, and Class 2-High requirements must be accomplished during the current year, without exception.

Your EPS data set is submitted biannually, once in the Fall and again in the Spring. USACHPPM conducts an extensive quality assurance (QA) review of the Spring data set and forwards the results of the review to the activity for comment. Final changes or corrections provided by the QA must then be incorporated into the activity data set for the Fall submission. These corrections ensure a high level of accuracy in the EPS and help the MEDCOM maintain a highly effective environmental program.

Project cost estimates must be reliable because we use this information to distribute environmental funds. Erroneous estimates jeopardize funding for other important projects. The Fall submission must contain accurate year-end obligation data, that is, the actual expenditures for each project. The obligation data must account for all environmental funds expended during the previous fiscal year. At the end of the FY, MEDCOM reconciles the installation/activity obligation data with the 218 Report submitted through Comptroller channels. These two reports must account for all environmental funding provided and must agree in order to avoid jeopardizing future funding.

Should you want to reprogram funds exceeding a combined total of $5,000 from any funded project to other valid environmental requirements, you must obtain approval from the MEDCOM POC listed in Appendix C.

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DRAFT IDENTIFICATION AND REPORTING OF ARMY MEDICAL DEPARTMENT ENVIRONMENTAL PROGRAM SUBMISSIONS (EPS)

1. PURPOSE.

This document provides guidance to Army Medical Department (AMEDD) Facilities [referred to as medical facilities (MFs) in this document] on the identification and reporting of environmental requirements.

2. SCOPE.

The information contained in this document applies to most MFs: medical treatment facilities (i.e. hospitals and clinics), laboratories and all other Medical Command (MEDCOM) subordinate units (including installations). Should a particular AMEDD activity find that this document does not apply to their situation, they should contact the MEDCOM point of contact (POC) listed in Appendix C to determine the appropriate mechanism for identifying their environmental requirements.

3. REFERENCES.

A list of the references used in the development of this document is provided in Appendix A. Appendix B contains a list of reference documents each EPS preparer should have readily available. Copies of these references can be obtained from the Defense Environmental Network Information Exchange (DENIX) on the World Wide Web (password required) at

https://www.denix.osd.mil/denix/DOD/Interaction/Reporting/reporting.html

or by contacting the U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) POC listed in Appendix C. A list of acronyms used in this document has been provided in Appendix F.

4. BACKGROUND.

Executive Order (EO) 13148 requires that each Executive Agency submit an annual plan for environmental compliance through the Environmental Protection Agency (EPA) to the Office of Management and Budget (OMB). The EPS Module is designed to track environmental projects through the phases of programming, budgeting, and execution. The cost estimates from the resulting EPS Module are used to develop and validate budget requests and assess the effectiveness of the MEDCOM's Environmental Program. The EPS Module is not a funding document; therefore, the identification of a project in the EPS Module does not ensure that the project will be funded. MEDCOM has developed a specific reporting mechanism and will use the requirements identified through this system to establish priorities and funding strategies for environmental costs within MEDCOM. Activities within MEDCOM will use the EPS Module

to develop future environmental budgets as required by the Defense Health Affairs (DHA). Thus, by ensuring that a project has been identified in the EPS Module, it is clear that commanders and environmental managers are making an effort to correct environmental problems by obtaining funding. This action could reduce the potential for personal liability should future environmental violations occur because a project was not implemented due to a lack of funding.

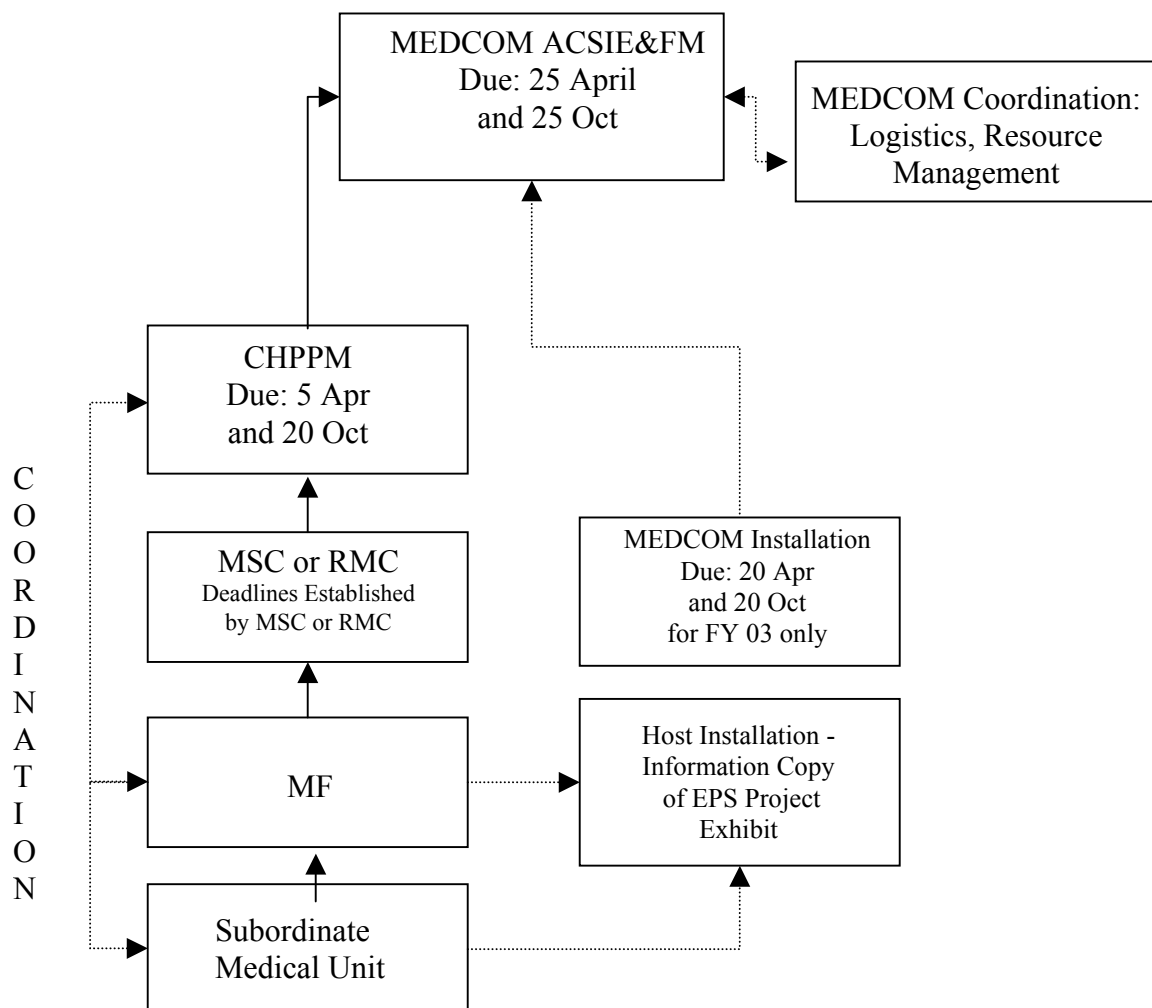**5. RESPONSIBILITIES IN THE MEDCOM EPR PROCESS.**

Figure 1 depicts the proper channels and time lines for submitting EPSs to MEDCOM. The actual process for developing an EPS project may depend on other local and higher headquarter requirements. There are many personnel involved in the EPS reporting process and the following paragraphs briefly discuss their role and responsibilities in this process.

   a. **Medical Facility (MF) Personnel.**

      (1) **Preventive Medicine (PM).**

      (a) **Environmental Science Officer**. The PM office is usually responsible for initiating and tracking environmental requirements for the MF.   As a result, the Environmental Science Officer (ESO) is responsible for maintaining the MF's EPS Module. Thus, the ESO generates and maintains the EPS Module for all MF environmental projects by updating it quarterly or more often if necessary. After the EPS data has been entered into the module, the ESO will archive and submit the MF data electronically to their RMC ESO twice a year as shown in Figure 1. The ESO should also generate a hard copy of the EPS Project Exhibit Report for the host installation environmental office. This will keep the host installation informed as to the status of the MFs environmental requirements. To ensure that only valid environmental projects are submitted, MEDCOM has established a quality assurance (QA) review program (see paragraph 5e), which generates QA comments for each EPS that is submitted. Upon receiving these comments from the USACHPPM regarding the current submission cycle, the ESO will provide responses to each comment and return them electronically with an updated EPS file through the RMC to the USACHPPM. Responders should either **Concur** with the recommended changes or **Non-concur** and provide an explanation regarding the non-concurrence. As the ESO is responsible for entering obligations data into the EPS Module, it is imperative that the ESO work closely with MF resource management personnel to establish expenditure tracking mechanisms. Army auditors are increasingly interested in being able to document how funds were obtained and obligated. An inability to supply these funding documents during an audit could jeopardize future environmental funding.

Figure 1. AMEDD EPS Submission Flow Chart.

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                    ┌──────────────────────┐
                    │  MEDCOM ACSIE&FM      │        ┌──────────────────────┐
                    │    Due: 25 April      │◄┄┄┄┄┤  MEDCOM Coordination: │
                    │    and 25 Oct         │┄┄┄┄►│  Logistics, Resource  │
                    └──────────────────────┘        │     Management        │
                                                    └──────────────────────┘
      ┌──────────────────────┐
      │      CHPPM            │
  C   │    Due: 5 Apr         │
  O   │    and 20 Oct         │
  O   └──────────────────────┘
  R
  D   ┌──────────────────────┐     ┌──────────────────────┐
  I   │   MSC or RMC          │     │  MEDCOM Installation  │
  N   │ Deadlines Established │     │    Due: 20 Apr        │
  A   │   by MSC or RMC       │     │    and 20 Oct         │
  T   └──────────────────────┘     │    for FY 03 only     │
  I                                └──────────────────────┘
  O   ┌──────────────────────┐     ┌──────────────────────┐
  N   │                      │     │  Host Installation -  │
      │        MF            │┄┄┄┄►│  Information Copy      │
      │                      │     │  of EPS Project        │
      └──────────────────────┘     │     Exhibit           │
                                   └──────────────────────┘
      ┌──────────────────────┐
      │   Subordinate         │
      │   Medical Unit        │
      └──────────────────────┘
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(b) **Chief of Preventive Medicine**. The Chief of Preventive Medicine's (C, PM) role in the EPS process is that of oversight and supervision. As the ESO's supervisor, the C, PM plays an important role in ensuring that the ESO has the time and resources necessary to accomplish the EPS mission. The C, PM must be prepared to step in and support the ESO when confronted with difficult situations internal to the MF, and must assist in the transition between ESOs when personnel changes take place.

(2) Other MF Personnel. While the ESO is primarily responsible for ensuring that the EPSs are properly submitted, input should be provided by a variety of activities within the MF, including: logistics, resource management, facilities, environmental services, safety, laboratories, industrial hygiene, radiation protection, and medical, dental, and veterinary staff. To ensure that all MF environmental requirements are properly identified, it is imperative that these activities freely participate in the project identification and execution process.

b. **Regional Medical Command**. The RMC ESO is responsible for consolidating and conducting an initial review of the EPSs from their subordinate MFs for validity and completeness. Incomplete or invalid EPSs will be returned to the MF for revision. The RMC ESO will then forward an electronic file of all complete and valid EPSs, along with all subordinate MF responses to the QA comments, to USACHPPM for quality assurance review by the suspense dates identified in Figure 1. RMCs should establish their own suspense dates for their subordinate MFs to ensure that the EPSs arrive at the RMC with sufficient time to review and coordinate any changes with the subordinate activities prior to forwarding a RMC consolidated EPS data set on to USACHPPM for QA review. Electronic mail is the preferred method for forwarding the EPS data set to USACHPPM; however, if electronic mail is not available, computer diskettes containing the file can be mailed to the following address:

   Center for Health Promotion and Preventive Medicine
   ATTN: MCHB-TS-EHM (Ms. Sandra Toscano)
   5158 Blackhawk Rd.
   Aberdeen Proving Ground, MD 21010-5403

As needed, RMC ESOs will develop and distribute appropriate EPS guidance to subordinate organizations to include SOPs regarding the transitioning of the EPS Module and data set between ESOs when personnel changes take place at the RMC and subordinate MFs. This will ensure that submission continuity is maintained. To avoid circumventing the chain of command, RMC ESOs should also coordinate with the subordinate MF Chief of Preventive Medicine to determine what internal procedures have already been put in place. A list of RMC ESOs is provided in Appendix C.

c. **Medical Installations.** Unlike tenant medical organizations who must submit their EPS Reports to the RMC, MEDCOM installations submit their EPS Reports directly to the MEDCOM Assistant Chief of Staff for Installations, Environment, and Facilities Management (ACSIEFM). Walter Reed AMC and Fort Detrick are the only two installations that will continue to submit their DHP and OMA funding requirements directly to MEDCOM as long as MEDCOM continues to support all of their environmental requirements. The MEDCOM

DCSIEFM will in turn provide the installation EPSs to USACHPPM for technical review and quality assurance. This will ensure review uniformity for all MEDCOM environmental requirements. Upon receiving the comments from the USACHPPM regarding the current submission cycle, responses and updates will be made and returned electronically with the updated file, in accordance with the suspense dates shown in Figure 1, through the MEDCOM to the USACHPPM. The installation's Environmental Coordinator must ensure all environmental funding is properly accounted for and reported through comptroller channels, and is included in the EPS Module **Obligated** data fields.

        d. **MEDCOM Major Subordinate Commands.** Non-RMC MEDCOM MSCs, such as USACHPPM and 18th MEDCOM, will follow the same EPS process used by the RMCs. This will ensure continuity among the equivalent subordinate MEDCOM units. Organizations that are subordinate to these commands are considered subordinate units (SUs) of a non-RMC MSC, and should submit their environmental requirements to their respective non-RMC MSCs.

        e. **U.S. Army Center for Health Promotion and Preventive Medicine.** Personnel at the USACHPPM assist the MEDCOM in conducting a technical quality assurance review (see paragraph 6c) of all EPSs submitted by the various MEDCOM organizations (MSC, RMC, MF, SU, or installation). USACHPPM consolidates all valid EPSs into a single data set and forwards them electronically to MEDCOM for budgetary and programming considerations. In addition to reviewing MEDCOM EPS submissions, USACHPPM, in coordination with MEDCOM also provides guidance regarding the EPS process to MEDCOM installations, MSCs, RMCs, SUs, and tenant MF personnel. USACHPPM personnel do not control distribution of funds nor do they determine which projects will be funded, but USACHPPM will provide a list, by electronic mail, of funded projects to each MSC, RMC, or MF once MEDCOM has determined which projects will be funded.

        f. **U.S. Army Medical Command.** MEDCOM personnel will review EPSs, establish command priorities, and distribute funds as necessary through resource management channels. MEDCOM is also responsible for submitting required funding information to DHA and disseminating appropriate EPS guidance to MEDCOM subordinate units.

        g. **Host Installation.** Typically, the host installation does not provide support in developing MF EPSs or maintaining the MF's EPS Module, but the host installation should be provided courtesy copies of EPSs so they are aware tenant requirements.

6. OTHER SUBMISSION ISSUES. The following sections address frequently asked questions regarding various EPS submission issues.

   a**. MEDCOM Submission Deadlines.** EPS submissions will be conducted twice a year along the time lines identified in Figure 1. Compliance driven requirements which were unexpected, or new MEDCOM directed requirements, will be accepted throughout the year on a case-by-case basis. Timely coordination with the MEDCOM, RMC, MSC and USACHPPM POCs listed in Appendix C is critical. Failure to meet Fall Submission deadlines will result in funding being withheld until a submission is provided. Failure to meet Spring Submission

deadlines will result in no funding being provided for the following FY. ***Projects must be programmed with sufficient time to allow MEDCOM to budget for these requirements. Projects that have not been programmed will receive the lowest priority for funding consideration.***

   b. MEDCASE Submissions. MEDCASE eligible environmental requirements should continue to follow the standard MEDCASE processing mechanisms. A hard copy of the EPS Project Exhibit report should accompany the original MEDCASE package through normal MEDCASE channels to U.S. Army Medical Materiel Agency (USAMMA) for review.   To ensure proper identification of the EPS project, "**MEDCASE"** should be entered in the "PROJECT NARRATIVE" field and the MEDCASE ACN number should also be included. Obligation data must also be reported in the EPS updates.

   c. Quality Assurance Review. USACHPPM provides a quality assurance review of all MEDCOM EPS submissions prior to forwarding a consolidated data set to MEDCOM. The USACHPPM reviewers attempt to rectify invalid or incomplete EPSs by contacting the applicable POC and clarifying any deficiencies. Minor deficiencies will be identified to the MEDCOM organization through QA review comments, but will not result in the EPS being withheld from the package being forwarded to MEDCOM. Grossly deficient or invalid requirements will be returned through the chain of command for correction. If corrections or justifications for these grossly deficient or invalid projects are not made in time to meet the MEDCOM suspense dates, these projects will be marked as **DISCONTINUED** in the data set sent forward to MEDCOM and will remain discontinued until such time as corrections are made or justifications are provided. MEDCOM will not fund a discontinued project. Following the USACHPPM QA review, written comments identifying deficiencies or errors will be provided to each installation/activity. EPS preparers should refrain from making additions/changes to their project information until the QA comments are received. EPS preparers must then make changes/corrections to their EPS data sets and respond to the comments made during the QA review by the suspense dates detailed in Figure 1. Failure to make recommended changes (even minor changes) or provide adequate defense for not making the recommended changes could result in the project being discontinued during future QA reviews and jeopardizes future EPS funding.

   d. Funding Process. Funds for MEDCOM installations and direct subordinate units are distributed from MEDCOM through resource management (RM) channels to the installation/unit RM office. Funds for tenant MFs are distributed via RM from the MEDCOM RM through the RMC to the MF. EPS preparers should work closely with the local RM offices to ensure proper execution of environmental funds. The USACHPPM POC, listed in Appendix C, will provide the RMC and MF a listing of the projects that MEDCOM has approved for funding and the level of funding that MEDCOM will provide. This courtesy notification will be made by e-mail as soon as MEDCOM releases this information. The MEDCOM will provide each MEDCOM installation with a listing of their projects showing the amount of funds provided for each project.

   e. Fund Reallocation. Reallocation of environmental funding can be accomplished, but <u>only</u> for other valid environmental projects. Redistribution of excess environmental funds under

$5,000 can be performed at the local level without prior MEDCOM approval. The MEDCOM POC must approve redistribution(s) of environmental funds from a specific project that totals in excess of $5,000. The MEDCOM POC is listed in Paragraph 1a, Appendix C. Written requests via electronic mail must be sent to the MEDCOM POC to obtain this approval.   In either case, proper documentation of the use of these funds must be provided in future EPS submissions. EPS preparers should use the **Comments** field in the EPS Module to document the reallocation of funds. The **Comments** field should contain information on how much money was redistributed, the date of redistribution, what project it was redistributed to (i.e. Project #), the date MEDCOM approval was obtained, and the name of the MEDCOM POC granting the approval. Figure 2 contains a sample **Comments** field screen documenting transfer of funds between EPS projects. Leave existing documentation discussions in the **Comments** field as a historical record.   Should the **Comments** field become full, delete the oldest historical data as needed. If the money was redistributed to a new project (i.e. no EPS existed for the project), then a new EPS project must be generated and included in the next submission.

Figure 2. Sample **Comments** Field Documenting Fund Transfer Between Projects.

COMMENTS:

FY01 - $3,000 transferred to FTTR00F029 and $6,000 transferred to FTR99S011, with MEDCOM approval received from Mr. Gonzalez via e-mail on 11 Nov 00.

FY00 - $3,500 transferred from FTTR98S021.

FY99 - $7,000 transferred from FTTR99S119, telephonic approval received from MEDCOM (Mr. Gonzalez) on 3 June 99.

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   f. Funding Reconciliation. To ensure proper use of EPS funds, MEDCOM will reconcile EPS obligations with the 218 Report submitted through comptroller channels. Any discrepancies may jeopardize future environmental funding for the MF or installation.

7. PROJECT SPECIFICS. To assist in the consolidating, revising, reviewing, and submitting process, the following MEDCOM standardization guidance is provided.

   a. Project Name. Each project must be given a name that readily identifies it. Examples include Hazardous Waste Disposal, Drinking Water Analyses, Purchase of a Xylene Recycling System, and Purchase of Incinerator Pollution Control Device. Avoid using ambiguous names like Conduct Assessment, Sampling, and Sample Analyses or names which are locally specific such as Bldg. 124 Renovations or DW45993. Ideally, all the recurring projects common to all MFs should have the same project name. Refer to Appendix D for some of the preferred common listings. A new EPR project must be developed for each new requirement. Once a project is reported completed, it must not be reactivated.

    b. Project Number. It is requested that the following nomenclature be used for numbering projects:

<p align="center">ABCDFYSXXX</p>

Where ABCD represents a standard 3 or 4 character acronym for the installation, FY represent the 2 character fiscal year identifier for the year that the project was <u>first</u> put into the database, S represents the season (either S for Spring or F for Fall) and XXX represents sequential numbering of projects (i.e., 001, 002, 003, etc.) for the year it was created. Note: Once a project number has been saved, it must not be changed.

    c. Technical Point of Contact. Identify the name and telephone number of the individual having working knowledge about each specific project. This may, or may not, be the individual filling out the EPS entry, though frequently a single POC at a facility (the ESO for example) is desirable. POC's and phone numbers should be updated whenever there is a change in personnel.

    d. Funding Requirements. When a project is expected to be a multi-year or recurring project, funding for future years must be identified. At a minimum, funding should be projected for at least 8 years into the future using the Required column of the funding screen. The Programmed column for the current FY should be updated during each Fall submission to reflect exactly how much funding the MF received for the project during the FY. The future years Required columns should be adjusted to reflect any updated future funding requirements. <u>Do not change</u> the current Required column funding amount. The funding level upon which MEDCOM bases the funding distribution for the coming FY is reflected in the Required columns for the out years. Finally the Obligated column is completed for the Fall submission, after the FY ends, to show the actual amount spent on each project. Add additional out-years during the Fall submission to maintain projections for 8 years into the future. Update future requirements based on latest expenditures and legitimate estimates such as: historical data (+2% inflation rate); equipment life; and new and emerging Regulations

    e. Multi-EPS Projects. Some larger projects may require multiple EPS submissions as some aspects of a large project may require a separate submittal or a separate funding code. For example, if a MF was purchasing an RMW treatment system, purchase cost and installation could be one EPS, but may require multiple funding codes (one for the purchase of the unit, one for installation if it is a major construction project and possibly a third for testing). Separate EPSs may be necessary for permits and required training.

    f. Supporting Narrative. Develop a thorough narrative providing detailed information to justify the project. Identify all applicable regulatory statutes and the consequences that may occur should the project not be funded. Statute citations should be detailed as possible, for example reference 40 CFR 267.34 rather than 40 CFR 267 if a specific subsection can be identified. This allows reviewers to easily find specific references that they can then use to justify the project if questions arise. This is especially important for state regulations, as the familiarity of reviewers with state regulations is usually minimal. Also, include the positive aspects of the project (i.e. waste reduction or cost reduction). For pollution prevention (P2)

projects where cost savings is a driver, briefly discuss the outcome of the cost analysis (the payback period will dictate whether a project is classified as high, medium or low). The Comments section can be used as an overflow for the narrative, if necessary, but keep all critical information in the Narrative section. Refer to Appendix D for examples.

8. FREQUENT ERRORS FOUND IN MF EPRs. To avoid submitting an EPS that gets rejected or delayed because of routine errors, follow the sample EPSs provided in Appendix D and review the following paragraphs before preparing your EPSs.

    a. <u>Out-year Funding Requirements</u>. The EPS database is capable of accepting out-year-funding requirements for up to 20 years into the future. While it is rarely necessary to identify funding requirements this far in advance, efforts should be made to identify requirements for at least 8 years into the future to stay ahead of the POM cycle.

    b. <u>Class</u>. Identifying the correct project Class is another frequently found error on many EPRs. Class 0 projects are recurring requirements needed to meet compliance standards. Class 1 projects are those **non-recurring** projects that correct existing compliance deficiencies. Class 2 projects are those **non-recurring** projects that correct potential deficiencies resulting from noncompliance with regulations promulgating in the next year or from noncompliance before the project can be completed if funding is not received during the current year. All other projects, both **recurring and non-recurring**, should be placed in Class 3.

    c. <u>Must Fund Policy</u>. Erroneously identifying a project as a Must Fund is the most common error found on EPSs. EPS preparers will frequently identify a project as Must Fund because from their point of view the project is very important. However, the Must Fund identifier is intended only for those projects that meet the requirements of the DA Must Fund policy. In general terms, this policy states that Must Fund projects are those recurring projects (Class 0) that are needed to manage and cover the basic elements of the environmental program i.e. hazardous waste disposal, permitting, and sampling, those currently out of compliance (all Class 1s), and those projects that will meet future compliance requirements and require funding sufficiently in advance to meet the deadline (high priority Class 2s). Thus, nice-to-have projects should not be designated as Must Fund. Page I-9 of the Policy and Guidance for Identifying U.S. Army Environmental Program Requirements: Support for Planning, Programming, Budgeting, and Execution of the Army Environmental Program (reference 2) states that *"Priority/Must Fund requirements in excess of environmental funds imply an obligation on the commander to reallocate funds from other sources to achieve compliance...."*. Therefore, projects erroneously identified as Must Fund not only risk being rejected during the review process, but may require the local commander to fund the project from other local resources.

    d. <u>Point of Contact</u>. The POC listed on an EPS should be someone who has direct knowledge of the project, why it is being submitted, and how the cost estimates were developed. These POCs should be updated as personnel transition.

    e. <u>Army Management Structure (AMS) Codes</u>. Missing or erroneous AMS Codes are a major concern for the budgeting and tracking of project funding. AMS Codes can be found in

Reference 5, Appendix A. However, to ensure that the correct AMS Code is being used, resource management personnel must be consulted.

   f. Ineligible Projects. Non-environmental projects should not be included in the EPS Module. Occupational safety and health projects are not part of the Army Environmental Strategy and are not financed with environmental funds. Routine recurring maintenance, operating costs (including silver recovery and prescription return contracts), routine grounds maintenance, and routine pest control operations should not be reported in the EPS database. Likewise, repair costs not associated with environmental standards are not environmental costs and should not be included in the EPS Report.

   g. P2 Category. The P2 Category field should be left blank for all projects that do not fall under the P2 Pillar.

   h. Database Management. The same database should be updated and used for each submission. When a project is completed, or is no longer applicable, designate it as completed or discontinued in the Progress Code as appropriate.

   i. Submission Format. To submit the EPS database, electronically provide a file through the chain of command (i.e. MF to RMC to USACHPPM or installation to MEDCOM). The Exhibit 2 Report, or similar display, should be provided to the host installation (if applicable) as a courtesy copy.

   j. Submission Deadlines. The EPS is submitted semiannually to MEDCOM. The submission deadlines typically fall in the April and October time frames (see Figure 1). Specific deadlines are published about 2 months in advance and distributed electronically to the RMCs, MSCs, MFs and installations. These deadlines are set to provide QA reviewers with enough time to perform the QA and forward the data to MEDCOM. Consequently, submissions that do not arrive to USACHPPM or MEDCOM by the specified deadlines may not be funded by MEDCOM. While these deadlines serve as the NLT date, early submissions will be accepted.

9. COMMON MF ENVIRONMENTAL PROJECTS. Environmental projects likely to be identified at MEDCOM subordinate units will mostly fall under two (Compliance and/or Prevention) of the four Army environmental program pillars (compliance, prevention, restoration, and conservation) or foundation (Reference 3, Appendix A). The paragraphs below summarize typical projects that should be included in the MF EPS Module. Each project should have a separate entry in the EPS database. This discussion is not complete and is not intended to be applicable in all situations; thus, each project should be evaluated to determine if it should be included and revised as necessary based upon local requirements. Detailed MF sample projects are provided in Appendix D. MEDCOM installations will find the list incomplete, as their property ownership responsibilities will result in many projects not found at tenant MFs. An EPR Project Catalog (Reference 4, Appendix A) has been developed for installation level environmental projects. Additional assistance in identifying projects can be obtained by contacting one of the POCs identified in Appendix C.

   a. **The Compliance Pillar.** Projects under the compliance pillar are those that ensure activities meet current or future regulatory requirements. These requirements may come from Federal, State, local, or host nation agencies. The following is a list of potential project areas that could fall under the compliance pillar. Each specific project should be separately identified in the EPS Module.

   (**1**) **Hazardous Waste (HW)/Regulated Medical Waste (RMW).**   This area covers all of the requirements associated with the identification, collection, transport and disposal of HW/RMW including projects to construct, upgrade, and operate temporary storage facilities. In addition, costs to purchase special HW/RMW storage containers or cabinets should be identified, as well as any costs charged by the host installation or contract costs in support of the projects mentioned above. Army Policy and Guidance (Reference 2, Appendix A) states that RMW should not be included in the EPR Module; however, MEDCOM still requires this information for budgeting purposes. Thus, RMW requirements should be reported similarly to HW requirements.

   (**2**) **Spill Kit Equipment.** State and local regulatory requirements for spill response equipment should be identified.

   (**3**) **Waste Pre-Treatment Systems.** Projects requiring the construction or purchase of waste pre-treatment units such as incinerators, sterilization or disinfection units, etc. based on State or local regulation should be identified under the compliance pillar. Note that these systems will frequently exceed $100,000 and will require submission as MEDCASE projects. If the project is designed to reduce pollution via volume reduction, etc. then the project should be identified by checking the **P2 Used for CMP** box on Project Page 2 of the EPS Module.

   (**4**) **Sampling.** Any regulatory required sampling and analysis (air emissions, liquid effluent, incinerator ash, drinking water, etc.) should also be submitted as an EPS requirement. Sampling for routine operations do no qualify for environmental funding. Potable water sampling for an installation is not an environmental funding requirement in most cases.

   (**5**) **Pollution Control Equipment.** Costs for the design, purchase, installation and testing of pollution control equipment to include scrubbers, baghouses, and water treatment facilities should be identified.

   (**6**) **Permits.** Preparation of permit applications or renewal of existing permits and associated fees should be included.

   (**7**) **P2 for Compliance.** Solutions to Class 1 and 2 compliance issues involving pollution prevention such as process changes or product substitutions (solvents) in lieu of waste management should be designated by checking the **P2 for Compliance Box** in the EPS software.

   (**8**) **Environmental Program Assessment System (EPAS).** Costs for oversight and development of corrective action plans from EPAS findings should be identified.

   b. **The Pollution Prevention Pillar.** Projects under the pollution prevention pillar are those that prevent and/or reduce pollution.   Pollution prevention may occur either directly through process modification, chemical substitution, or recycling, or indirectly through energy conservation. These projects should be the preferred solution to Class 1 or 2 requirements. Pollution Prevention projects that remedy Class 1 or 2 requirements should receive a Class 1 or 2 rating and be included under the Compliance Pillar. Pollution prevention projects are usually driven by monetary, not regulatory, considerations and must have a cost savings analysis provided in the justification. Include a payback period in the narrative.

   (1) Pollution Prevention Opportunity Assessments. Costs for conducting Pollution Prevention Opportunity Assessments for MFs and the generation/revision of Pollution Prevention Plans for MEDCOM installations should be identified.

   (2) Recycling and Reclamation Units. Costs for the purchase of recycling units should be included. These units may include the following: ethylene oxide recycling equipment; solvent distillation units; formalin recycling equipment; silver recovery units for x-ray processor fixer discharges; mercury or amalgam reclamation units. The operation and maintenance costs associated with these projects beyond their first year of operation are not considered environmental requirements and should not be included in the EPS Module.

   (3) Procurement of Pollution Preventing/Reducing Technologies. Identify costs to purchase proven (i.e. already being used by other Army organizations) alternative technologies that will eliminate or reduce the quantity or toxicity of the waste being generated, or will result in a reduction in utility (electric, water, fuel, etc.) requirements. The operation and maintenance costs associated with these projects beyond their first year of operation are not considered environmental requirements and should not be included in the EPS Module.

   (4) Technology Demonstration Projects. Costs associated with evaluating new alternative technologies (that are currently not used by Army facilities) should be identified. Typically these projects should focus on technologies that will reduce the quantity or toxicity of the waste being generated or result in a reduction in utility requirements.

   (5) Hazardous Materials Pharmacy. Projects associated with the development and implementation of hazardous material pharmacies designed to reduce waste through product management should be included as an EPS. The Hazardous Material Management Program (HMMP) is partially funded via the Army Environmental Center, and certain aspects of this operation may be funded through the EPS program.

   c. **The Conservation Pillar.** The Conservation Pillar includes activities that conserve, protect, and enhance natural and cultural resources. Conservation projects are usually the responsibility of the installation and rarely will be identified as a MF tenant requirement. In most cases developing NEPA documentation in support of construction projects is a funding responsibility of the project proponent.

   d. **The Restoration Pillar.** The Restoration pillar includes activities which cleanup previous contamination. Like the Conservation projects, Restoration projects are usually an installation responsibility and will not usually be identified as a MF tenant requirement.

   e. **The Foundation Pillar.** As its name implies, Foundation projects affect all four environmental program pillars. Salaries must be programmed against the respective EPS pillar (Compliance, Conservation, Prevention). Personnel salaries for government employees at MFs will not usually qualify for environmental funding. However, contract services may qualify for funding.

   (1) Program Management. Labor costs to support environmental programs should be included whether funded via the EPS or not. However, salary costs for full time activity employees outside MEDCOM installations is not usually funded with environmental dollars. Job descriptions and TDAs will have to be provided for review before any decisions can be made.

   (2) Training. Costs associated with environmental training should be identified. These costs should include registration fees, travel, and per diem. There are two designations of training requirements: required and professional development. Required training is training that is mandated by specific regulatory citations. **Required training** is usually a Class 0, Must Fund, recurring project, though if it is a one-time requirement it could be a Class 1 or 2 depending on the regulatory status. **Professional development** is training that is not specifically required by a regulation, but is beneficial for staff enhancement and is considered a Class 3, non-Must Fund.

10. ADDITIONAL INFORMATION. Comments or questions regarding this document should be addressed to Ms. Sandy Toscano, Pollution Prevention and Compliance, DSN 584-5223 or commercial 410-436-5223, or Sandra.Toscano@us.army.mil.

APPENDIX A

REFERENCES

1. Executive Order 13148, 21 April 2000, Greening the Government Through Leadership in Environmental Management.

2. Policy and Guidance for Identifying U.S. Army Environmental Program Requirements: Support for Planning, Programming, Budgeting, and Execution of the Army Environmental Program, Department of the Army, Office of the Director of Environmental Programs, February 2002 (available through DENIX https://www.denix.osd.mil/denix/DOD/Interaction/Reporting/reporting.html#epr)

3. U. S. Army Environmental Strategy into the 21st Century, 17 June 1992.

4. U.S. Army Environmental Program Requirements Project Catalog, A Catalog of Sample EPR Project Submissions and Program Guidance, U.S. Army Environmental Center, August 2002 (available for download through DENIX https://www.denix.osd.mil/denix/DOD/Interaction/Reporting/reporting.html#epr)

6. DFAS-IN 37-100-FY, Financial Management - The Army Management Structure (AMS). Note: The FY in the document number will be the current FY (available for download at http://www.asafm.army.mil/secretariat/document/dfas37-100/dfas37-100.asp).

APPENDIX B

EPS DESK REFERENCES

1. Policy and Guidance for Identifying U.S. Army Environmental Program Requirements: Support for Planning, Programming, Budgeting, and Execution of the Army Environmental Program, Department of the Army, Office of the Director of Environmental Programs, February 2002.

Frequently referred to as the **Green Book**, this is the basic guidance document for explaining the EPR reporting process (at the DA level, not within MEDCOM) and the data entry fields. Guidance on responsibilities, project classifications and rankings, and Must Fund policies are provided. In addition, this guide provides explanations of each data entry field and identifies potential entries. This guidance document is formatted more for installation environmental offices than tenant activities. Yet, it provides an initial starting place for MFs.

https://www.denix.osd.mil/denix/DOD/Interaction/Reporting/reporting.html#epr

2. U.S. Army Environmental Program Requirements Project Catalog, A Catalog of Sample EPR Project Submissions and Program Guidance, U.S. Army Environmental Center, August 2002.

This catalog published by the U.S. Army Environmental Center and contains a compilation of information for typical EPRs. Information found in this catalog includes standard entries for specific data entry fields, generic narratives, and funding estimating techniques. Like the Green Book, the EPR Project Catalog is designed more for installation environmental offices, rather than tenant actives, so tenant MF's should keep this in mind when using this document. It is available on DENIX.

https://www.denix.osd.mil/denix/DOD/Interaction/Reporting/reporting.html#epr

APPENDIX C

POINTS-OF-CONTACT

1. The following personnel can be contacted to provide specific EPR assistance.

    a. U.S. Army Medical Command
       ATTN: MCFA-E (Mr. Gilbert Gonzalez)
       Fort Sam Houston, TX 78234-6022
       DSN 471-6441 or commercial: 210-221-6441
       FAX 210-221-6672
       e-mail: Gilbert.Gonzalez3@amedd.army.mil

    b. U.S. Army Center for Health Promotion and Preventive Medicine
       ATTN: MCHB-TS-EHM (Ms. Sandy Toscano)
       5158 Blackhawk Road
       APG, MD 21010-5403
       DSN 584-5223 or commercial 410-436-5223
       FAX 410-436-5237
       e-mail: Sandra.Toscano@us.army.mil

2. Regional Medical Commands.

    a. <u>North Atlantic RMC</u>
       Walter Reed Army Medical Center
       ATTN: MCHL-H Preventive Medicine
       Washington, D.C. 20307-5001
       Commercial: 202-782-3781

    b. <u>Southeast RMC</u>
       Dwight David Eisenhower Army Medical Center
       ATTN: MCHL-PMD
       FT Gordon, GA 30905-5000
       Commercial: (706) 787-2517

    c. <u>Great Plains RMC</u>
       Brook Army Medical Center
       Preventive Medicine Services
       ATTN: MCHE-DH
       Fort Sam Houston, TX 78234-6200
       Commercial: 210-295-2423

    d. <u>Pacific RMC</u>

Tripler Army Medical Center
Preventive Medicine Services
ATTN: MCHK-PV
1 Jarrett White Road
Tripler AMC, HI 96859-5000
1-800-322-8262 x-6693/6694
DSN 315-433-6693/6694
Commercial 808-433-6693/6694
FAX 808-834-1580

e.   Northwest RMC
Madigan Army Medical Center
Preventive Medicine Services
ATTN: MCHJ-PV-EH
Tacoma, WA 98431-5000
Commercial: 253-968-4334
DSN 782-4334
FAX 253-968-3337

f. European RMC
ERMC
CMR 442,
APO AE 09042-0130
DSN 314-371-3296

g. 18th MEDCOM
Preventive Medicine Services
18th MEDCOM
ATTN: Industrial Hygiene Branch
Unit# 15281
APO AP 96205-0054
Commercial: 011-822-7916-3025/3039
DSN 315-736-3039

APPENDIX D
ENVIRONMENTAL PROGRAM SUBMISSION (EPS)
DATABASE EXAMPLES

This document contains basic examples of typical projects found in an MF. These examples are not meant to serve standards, but as illustrations only. For specific questions, contact the local ESO, the installation environmental office, the RMC ESO, or USACHPPM POC: Brian Jones (DSN 584-5229).

Hazardous Waste Storage Containers

Discussion*:   To maintain compliance with HW regulations, storage containers must be purchased to store HW properly. Usually these containers are in the form of 55-gallon drums, but may include other size containers and overpack drums.*

Project Name.........................HAZARDOUS WASTE STORAGE CONTAINERS
Reason for Initiation ..………OTHER
P2 Category...........................N/A
Pillar.....................................COMPLIANCE
Progress Code ....………9 (Recurring)
Program Area ....………SPILL CLEANUP, PREVENTION, AND CONTROL
Law/Reg................................RCRC
Environmental Category ....GENR
Compliance Status ....OTHR
Project Assessment ....H
Class......................................0
Must Fund..............................Y
Fund Type..............................26 (DHP)

Typical Narrative: Project includes the purchase of hazardous waste containers used in collection, transport, and disposal of hazardous wastes. Use of proper containers is required by the Resource Conservation and Recovery Act (40 CFR 262, Subpart I) and the State of X's Department of Environmental Management (chapters x-x). These containers are required to achieve and maintain environmental compliance with the above mentioned regulations. Failure to obtain and use proper containers could result in notice of violation during compliance inspections and fines of $X/day/violation.

Hazardous Waste Disposal

Discussion: *This project is intended to identify the recurring disposal costs of all hazardous wastes provided that the supporting installation does not provide this service free of charge.*

Project Name..........................HAZARDOUS WASTE DISPOSAL COSTS
Reason for Initiation ..………OTHER
P2 Category............................N/A
Pillar......................................COMPLIANCE
Progress Code ....…………9 (Recurring)
Program Area ....…………Hazardous Waste Disposal
Law/Reg.................................RCRC
Environmental Category ....DISP
Compliance Status ....OTHR
Project Assessment ....H
Class.......................................0
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: Cost for the proper disposal of roughly x lbs of hazardous waste per year. Proper disposal of hazardous waste via contract/DRMO is required by the Resource Conservation and Recovery Act (40 CFR 262) and the State of X's environmental statues (section x). Proper and timely disposal as required to maintain compliance with the above regulations. Failure to comply may result in a notice of violation and fines of up to $X/day/violation.

Hazardous Waste Storage Facility Construction/Upgrades

Discussion: *This project is designed for the funding of construction or upgrade of the less than 90-day HW storage facility in order to maintain compliance. Identification of the project start and completion dates and updates to the progress code are vital.*

Project Name..............CONSTRUCTION OF HAZARDOUS WASTE STORAGE FACILITY
Reason for Initiation ..………OTHER
P2 Category...........................N/A
Pillar.......................................COMPLIANCE
Progress Code ....………1 (Preliminary Planning), 2 (Design), or 3 (Construction)
Program Area...........………SPILL CLEANUP, PREVENTION, AND CONTROL
Law/Reg.................................RCRC
Environmental Category ....GENR
Compliance Status ....OTHR
Project Assessment ....H
Class......................................0
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: Project involves the construction/upgrade of a hazardous waste less than 90-day storage facility. Hazardous waste storage must conform to the requirements stated in the Resource Conservation and Recovery Act (40 CFR 262, Subpart DD) and the State of x's environmental requirements (Sections x-xx of the State Code). This construction [or description of the upgrade i.e. new roof, emergency communications, etc.] is required to achieve and maintain compliance with the above regulations. Failure to construct/upgrade the hazardous waste storage facility could result in a notice of violation during compliance inspections and fines of up to $X/day/violation.

Regulated Medical Waste Storage Containers

Discussion: To maintain compliance with RMW regulations, special storage containers, typically red bags, sharps containers, and RMW storage bins, must be purchased to store, transport, and dispose of RMW properly.

Project Name..........................REGULATED MEDICAL WASTE STORAGE CONTAINERS
Reason for Initiation ...………OTHER
P2 Category............................N/A
Pillar......................................COMPLIANCE
Progress Code ....……….9 (Recurring)
Program Area ....……….SPILL CLEANUP, PREVENTION, AND CONTROL
Law/Reg.................................RCRC
Environmental Category ....GENR
Compliance Status ....OTHR
Project Assessment ....H
Class.......................................0
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: Project includes the purchase of containers (red bags, RMW storage bins and sharps containers) used in collection, transport, and disposal of regulated medical wastes. Use of proper containers is required by the State of X's Department of Environmental Management (chapters x-xx) and AR 40-5. Containers are required to achieve and maintain environmental compliance with the above mentioned regulations. Failure to obtain and use proper containers could result in notice of violation during compliance inspections and fines of $X/day.

Regulated Medical Waste Disposal

Discussion: To maintain compliance with RMW regulations, RMW must be disposed of in a proper and timely manner. This project includes the cost of disposal only.

Project Name.........................REGULATED MEDICAL WASTE DISPOSAL COSTS
Reason for Initiation ..………OTHER
P2 Category............................N/A
Pillar.....................................COMPLIANCE
Progress Code ....………9 (Recurring)
Program Area ....……….Regulated Medical Waste Disposal
Law/Reg................................RCRC
Environmental Category ....DISP
Compliance Status ....OTHR
Project Assessment ....H
Class.....................................0
Must Fund.............................Y
Fund Type ....26 (DHP)

Typical Narrative: Funding is required for the proper disposal of roughly x lbs of regulated medical waste per year. Proper disposal of regulated medical waste is required by the State of X's Environmental/Health Department Statues (section x) and AR. 40-5. Proper and timely disposal is required to maintain compliance with the above regulations. Failure to comply may result in a notice of violation and fines of $X/day.

Hazardous Waste Characterization

Discussion*: Project includes one time sampling and analysis of uncharacterized or unknown waste.*

Project Name..........................HAZARDOUS WASTE CHARACTERIZATION
Reason for Initiation ...………OTHER
P2 Category............................N/A
Pillar.......................................COMPLIANCE
Progress Code ....…………8 (Other)
Program Area ....…………Sampling
Law/Reg..................................MULT
Environmental Category ....SMPL
Compliance Status ....OTHR
Project Assessment ....H
Class.......................................0
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: Project involves the one time sampling and analysis of uncharacterized waste streams for hazardous waste determination. Proper characterization of wastes is required by the 40 CFR 262.11 and the State of X's environmental statute sections x-xx to prevent illegal discharge of hazardous wastes. Proper and timely sampling is required to maintain compliance with the above regulations. Approximately X number of samples are taken annually at an average cost of approximately $X/sample. Typical analytes include heavy metals and organics. Failure to comply could result illegal discharge of hazardous wastes, a notices of violations, and fines of up to $X/day/violation.

Wastewater Sampling

Discussion: *Includes sampling, analysis, and monitoring of various aqueous waste streams throughout the MF. Include all wastewater-sampling costs on a single EPR. This project would be to determine effluent characterization from the hospital or treatment facility into the sanitary sewer, not discharge from the wastewater treatment plant.*

Project Name..........................WASTEWATER SAMPLING AND ANALYSIS
Reason for Initiation ..………OTHER
P2 Category............................N/A
Pillar......................................COMPLIANCE
Progress Code ....…………9 (Recurring)
Program Area ....…………Sampling
Law/Reg.................................MULT
Environmental Category ....SMPL
Compliance Status ....OTHR
Project Assessment ....H
Class.......................................0
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: Proper monitoring of x equipment effluent is required by the 40 CFR 262.11 and the State of X's environmental statute sections x-xx to prevent illegal discharge of hazardous waste into the sanitary sewer system. Proper and timely sampling is required to maintain compliance with the above regulations. X number of samples cost approximately $X with heavy metals and organics as the typical analytes. Failure to comply could result in a notice of violation and fines of up to $X/day/violation.

Training

Discussion*: To maintain compliance with the various laws and regulations that mandate training for environmental personnel to include handlers and transporters of waste or biological specimens. Training that is not specifically required by a regulatory driver should be listed on a separate EPR (titled Training – Professional Development) as a Class 3 requirement.*

Project Name.........................TRAINING - REQUIRED
Reason for Initiation ..………OTHER
P2 Category...........................N/A
Pillar.....................................COMPLIANCE
Progress Code ....………9 (Recurring)
Program Area ....………TRAINING - ENVIRONMENTAL REGULATION
Law/Reg................................MULT
Environmental Category ....TRNG
Compliance Status ....TRNG
Project Assessment ....H
Class......................................0 [see discussion above]
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: This project involves the required training (*list all applicable regulations)* of x environmental staff in the proper [*list appropriate training i.e. management, handling, storage, transportation, and disposal of hazardous/regulated medical waste, management of a safe drinking water program, or proper management of a regulated medical waste incinerator]* according to regulation x.. Proper training in these areas allows for a comprehensive and compliant environmental program. Failure to comply may result in a notice of violation and fines of up to $X/day/violation.

Spill Response Equipment

Discussion: *This project can be applied in different ways. In this example, the spill response equipment is intended for general spills occurring within the MF or outside as delineated by the NPDES permit. If the spill response equipment is specifically for the hazardous waste less than 90-day storage facility, then the Law/Reg would be RCRC (40 CFR 264) and the Environmental Category would be GENR. If the State has specified this requirement in a citation category (RCRA, P2, or CWA), then use the most applicable LAW/REG.*

Project Name..........................SPILL RESPONSE EQUIPMENT
Reason for Initiation ..………OTHER
P2 Category...........................N/A
Pillar......................................COMPLIANCE
Progress Code ....…………8 (Other)
Program Area ....…………SPILL CLEANUP, PREVENTION, AND CONTROL
Law/Reg.................................CWA
Environmental Category ....SPCC
Compliance Status ....OTHR
Project Assessment ....H
Class......................................0
Must Fund ....Y
Fund Type ....26 (DHP)

Typical Narrative: this project involves the requirement for spill response equipment needed to prevent and control accidental spills of wastes and materials. This equipment is required by [dependent on application: the Clean Water Act (40 CFR 112) as part of the SPCCP, the Resource Conservation Act (40 CFR 264.32), State Regulation x, and AR. 40-5]. The spill equipment includes [list the type and numbers of equipment to be purchased]. Failure to comply with the above regulations may result in an illegal water discharge or significant soil contamination that in turn requires extensive cleanup and may include fines of $X/day from compliance agencies.

Pollution Prevention Projects

Discussion: Pollution prevention (P2) projects should be placed with the governing law/regulation that would be most effected by the project. In this example, the replacement of ethylene oxide sterilization by hydrogen peroxide is used; therefore, the most affected regulation is the Clean Air Act. If you were to begin recycling xylene, RCRC would be the most affected governing law. As for the assessment and class, the assessment should reflect the amount of waste/cost/hazard reduction and the class should follow the regulatory standards description. If the class designation follows a regulatory requirement, be sure to include that in the narrative. Completely fill out the cost benefit sections to include zeros where appropriate - this is a significant difference than in the past. No longer will the breakdown cost information be required in the narrative, as it is presented elsewhere in the EPR Module. Additionally, P2 projects that eliminate compliance requirements should be further designated by marking the P2 for Compliance Checkbox on Project Page 2.

POLLUTION PREVENTION: REPLACEMENT OF ETO

Project Name ....P2: REPLACEMENT OF ETO
Reason for Initiation ....HAZMIN
P2 Category ....Projects that reduce the use of hazardous materials (C00)
Pillar... ....POLLUTION PREVENTION
Progress Code ....8 (Other)
Program Area ....HAZMIN
Law/Reg ....CAA
Environmental Category ....POLP
Compliance Status ....ESDL
Project Assessment ....M
Class 3
Must Fund ....N
Fund Type ....26 (DHP)

Typical Narrative: This pollution prevention project is designed to replace the existing ethylene oxide sterilization system (ETO) with a less polluting hydrogen peroxide system. Essentially all items that were previously sterilized in the ETO can be sterilized just as effectively in the hydrogen peroxide system. Thus, not only will overall operational costs decrease by $37,000 annually with a estimated payback period of 3 years (less than 5), but the operational issues surrounding the ETO hazards to include all the alarms and detectors will be eliminated with the elimination of the ethylene oxide emissions.

Pollution Prevention Projects Cont.

POLLUTION PREVENTION: RECYCLING ETHYL ALCOHOL

Project Name..........................P2: RECYCLING ETHYL ALCOHOL
Reason for Initiation ....HAZMIN
P2 Category...........................Projects that reduce the use of hazardous materials (C00)
Pillar......................................POLLUTION PREVENTION
Progress Code ....8 (Other)
Program Area.........................HAZMIN
Law/Reg.................................RCRC
Environmental Category ....POLP
Compliance Status ....ESDL
Project Assessment ....M
Class......................................3
Must Fund ....N
Fund Type..............................26 (DHP)

Pollution Prevention Projects Con't.

Typical Narrative: This pollution prevention project is designed to reduce material cost and disposal through the recycling of ethyl alcohol via distillation. Applications of this distilled ethyl alcohol will be essentially identical to new product except for the final stage in the tissue processing procedure. Thus, overall costs will be decreased by $2730 annually with a estimated payback period of 4 years (less than 5).

POLLUTION PREVENTION: RECYCLING XYLENE

Project Name..........................P2: RECYCLING XYLENE
Reason for Initiation ....HAZMIN
P2 Category...........................Projects that reduce the use of HM (C00)
Pillar......................................POLLUTION PREVENTION
Progress Code ....8 (Other)
Program Area.........................HAZMIN
Law/Reg.................................RCRC
Environmental Category ....POLP
Compliance Status ....ESDL
Project Assessment ....M
Class......................................3
Must Fund ....N
Fund Type..............................26 (DHP)

Typical Narrative: This pollution prevention project is designed to reduce material cost and disposal through the recycling of xylene via distillation. Applications of this 95% xylene will be essentially identical to new product. Thus, overall costs will be decreased by $2700 annually with a estimated payback period of 4 years (less than 5).

POLLUTION PREVENTION: ALTERNATIVE MEDICAL WASTE TREATMENT

Project Name..........................P2: Alternative RMW Treatment
Reason for Initiation ....HAZMIN
P2 Category...........................Process Modification (D01)
Pillar......................................COMPLIANCE [also mark the P2 for compliance box]
Progress Code ....7 (Process Modification)
Program Area.........................P2
Law/Reg.................................CAA
Environmental Category ....CTAP
Compliance Status ....ESDF
Project Assessment ....H
Class.......................................2
Must Fund..............................Y
Fund Type..............................26 (DHP)

Typical Narrative: This pollution prevention project is designed to replace the regulated medical waste incinerator with an alternative technology: [state type] in order to eliminate the compliance requirements for emissions controls as stated in 40 CFR Part 60 Subpart Ce. This alternative has a payback period of less than 3 years. Failure to comply with the above regulations may result in illegal air emissions and may include fines of $X/day from compliance agencies.

APPENDIX E
PROPERTY NUMBERS

Installation	Property Number
Camp Bullis	20133
FT Belvoir	20082
FT Benning	21018
FT Benjamin Harrison	20402
FT Bliss	20101
FT Bragg	20121
FT Campbell	20140
FT Carson	20150
FT Detrick	20267
FT Drum	20281
FT Eustis	20321
FT Gordon	20368
FT Hood	20424
FT Huachuca	20434
FT Irwin	20446
FT Jackson	20449
FT Knox	20479
FT Leavenworth	20499
FT Lee	20502
FT Leonard Wood	20979
FT Lewis	20506
FT McClellan	20562
FT Meade	20567
FT Monmouth	20597
FT Polk	20716
FT Riley	20756
FT Rucker	20776

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FT Sill                                      20846

FT Stewart                                   20872

Redstone Arsenal                             20742

West Point                                   20915

Brook AMC                                    20429

Eisenhower AMC                               20368

Madigan AMC                                  20506

USA MEDDAC – Alaska                          22426

Tripler AMC                                  22241

USA MEDDAC - Japan                           (ZAMA)

Walter Reed AMC                              21156

Landstuhl Regional Medical Center – Germany  GE48R

Heidelberg MEDDAC – Germany                  GE643

Wuerzburg MEDDAC - Germany                   GE96W

Shape Healthcare Facility - Belgium          ML010

18th MEDCOM                                  KS948
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APPENDIX F
ACRONYMS

ACSFAC .... Assistant Chief of Staff for Facility
AMEDD .... Army Medical Department
AEP .. .. Army Environmental Program
AMS Code .... Army Management Structure Code
DA .... Department of the Army
DHA . ... Defense Health Affairs
ECAS .... Environmental Compliance Assessment System
EO .... Executive Order
EPA . ... Environmental Protection Agency
EPS ... . Environmental Program System
ESO . ... Environmental Science Officer
HW .. .. Hazardous Waste
MACOM .... Major Command
MEDCOM ... . Medical Command
MF .... Medical Facility
MSC .... Major Subordinate Command
OMB . ... Office of Management and Budget
PM ... . Preventive Medicine
RMC .... Regional Medical Command
RMW .... Regulated Medical Waste
SU...... .... Subordinate Unit
USACHPPM .... U.S. Army Center for Health Promotion and Preventive Medicine